



105966

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUL 02 1998

SR-6J

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**RE:** Demand for reimbursement of costs expended at Site G of the  
Sauget Area 1 Proposed Superfund Site at Sauget, Illinois

Dear Sir:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants, or contaminants at the above-referenced Site. The U.S. EPA believes that your company is responsible for costs incurred by the U.S. EPA at this proposed Superfund Site.

U.S. EPA and the State of Illinois EPA have taken action at the Site, under the authority of the Superfund Program. Your company is responsible for reimbursing the U.S. EPA for the response costs associated with the Site (1) preliminary assessment and site investigation and (2) the 1995 removal action, conducted to reduce any immediate threat to the environment or human health. The approximate total response costs identified up through May 14, 1998 for the Site are \$615,618.97. A summary of these costs is enclosed. (See Attachment A).

According to Section 107(a) of CERCLA, potentially responsible parties (PRPs) are jointly and severally liable for all costs incurred by U.S. EPA at a Superfund site, meaning any one party may be liable for all site costs. To assist the PRPs in negotiation with U.S. EPA concerning this matter, attached to this letter is a list of names and addresses of other PRPs to whom this demand for reimbursement is being sent. (See Attachment B.) It should be noted that inclusion on or exclusion from the list does not constitute a final determination by

U.S. EPA concerning the liability of any party for payment of response costs. Usually, partial payments will not release the payor of liability for payment of the rest of the costs that are owed to U.S. EPA.

We hereby demand that you make restitution by payment in the amount of \$615,618.97 plus interest. Pursuant to Section 107(a) of CERCLA, interest shall begin accruing as of the date of this demand, if payment is not received within twenty (20) days of the date of this letter.

Such payment must be made to the U.S. EPA Hazardous Substances Superfund established pursuant to Section 221 of CERCLA, which is administered by U.S. EPA. Please send your check to:

U.S. EPA - Region V  
Attn: Superfund Accounting  
P.O. Box 70753  
Chicago, Illinois 60673

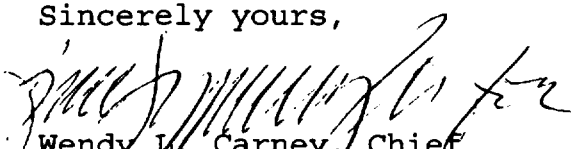
Please place the following Site Identification Number on the check: 4V. Please, also, send a copy of your payment check to Thomas Martin in the Office of Regional Counsel at the following address:

Thomas Martin, Associate Regional Counsel  
Office of Regional Counsel (C-14J)  
U.S. EPA - Region 5  
77 W. Jackson Boulevard  
Chicago, IL 60604-3590

If a response from you is not received within twenty (20) days, the U.S. EPA will assume that you have declined to reimburse the Superfund for the Site expenditures, and pursuant to CERCLA, U.S. EPA may pursue civil litigation to recover its costs.

If you desire to discuss your liability with U.S. EPA, please contact Thomas Martin, Associate Regional Counsel, within thirty days of the date of this letter, by telephone or facsimile. Mr. Michael McAteer is the assigned Federal Remedial Project Manager to the Sauget Area 1 Sites, and may be reached by phone at (312) 886-4663; his facsimile number is (312) 886-4071.

Sincerely yours,

  
Wendy L. Carney, Chief  
Remedial Response Branch #1

Enclosures

cc: Paul Takacs, Illinois Environmental Protection Agency

**ATTACHMENT A**  
**REVISED ITEMIZED COST SUMMARY**  
**SAUGET AREA ONE, SITE G, IL**  
**SUPERFUND SITE # 4V**  
**PREPARED 05/14/98**

<u>EPA EXPENDITURES</u>	<u>Cumulative Costs</u> <u>Through December 31, 1997</u>
<b>EPA PAYROLL --</b>	
--Headquarters	\$ 0.00
--Regional	62,874.16
<b>INDIRECT COST --</b>	
--	125,945.10
<b>EPA TRAVEL --</b>	
--Headquarters	0.00
--Regional	9,148.77
<b>CLP CONTRACTS --</b>	
--Financial Cost Summary	0.00
<b>ERCS CONTRACT --</b>	
--Riedel Environmental Services (68-S2-5001)	406,178.78
<b>STATE COOPERATIVE AGREEMENT --</b>	
--Illinois E.P.A. (68S201)	7,957.00
<b>START CONTRACT --</b>	
--Ecology & Environment (68-W6-0011)	0.00
<b>TAT CONTRACT --</b>	
--Ecology and Environment, Inc. (68-W0-0037)	4,514.16
<b>TOTAL EPA COSTS BEFORE INTEREST</b>	<b>615,618.97</b>
<b>TOTAL COSTS RECOVERED TO DATE</b>	<b><u>0.00</u></b>
<b>TOTAL EPA COSTS FOR SAUGET AREA ONE, SITE G</b>	<b>615,618.97</b>
Pre-Judgment Interest	<b><u>0.00</u></b>
<b>TOTAL EPA UNRECOVERED COSTS</b>	
<b>FOR SAUGET AREA ONE, SITE G, IL</b>	<b>615,618.97</b>

**Please Note:**

National Contract Laboratory program costs may be significantly understated. These costs do not include any lab costs that may have been billed to EPA prior to FY 1986, if such costs were incurred, and no estimate of the CLP Sample Management Cost (ranges from 6.1 % to 17.0 % of Analytical costs) is provided. A complete accounting of Contract Laboratory Costs normally is provided by VIAR within the documentation process.

This summary does not include Department of Justice cost. Those costs will be documented separately by the Department of Justice.

**ATTACHMENT B**

**PARTIES RECEIVING DEMAND LETTER**

1. Monsanto Chemical Co.  
Attn: D. Michael Light  
800 North Lindbergh Ave.  
St. Louis, Missouri 63167
2. Solutia, Inc.  
10300 Olive Blvd.  
P.O. Box 66760  
St. Louis, MO 63166
3. Solutia, Inc.  
Krummrich Plant  
500 Monsanto Ave.  
Sauget, IL 62206-1198
4. Solutia, Inc.  
Queeny Plant  
1700 South Second St.  
St. Louis, MO 63177
5. Industrial Salvage & Disposal Co.  
2700 Monsanto Ave.  
Sauget, Illinois 62206
6. Sauget & Co.  
2700 Monsanto Ave.  
Sauget, Illinois 62206
7. Paul Sauget  
2700 Monsanto Ave.  
Sauget, Illinois 62206
8. Mobil Oil Corporation  
150 East 42nd St.  
New York, New York 10017
9. Mobil Oil Corporation  
Attention: Dominick De Angelis  
EHS Superfund Response Group  
3225 Gallows Road  
Fairfax, VA 22037

10. Mobil Oil Corp  
200 S. 20th Street  
Sauget, IL 62206
11. Cerro Copper Products Company  
P.O. Box 66800  
St. Louis, MO 63104
12. Cerro Copper Products Company  
3000 Mississippi Ave.  
Sauget, IL 62206
13. Harold Wiese  
1445 Woodson Rd.  
St. Louis, MO 63132